

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID)
STEINER and STEINER)
ASSOCIATES, LLC,)

Plaintiffs,)

CA No. 21-CV-11181-PBS

vs.)

EBAY, INC., et al.,)

Defendants.)

VIDEOTAPE DEPOSITION OF ANNELI OLAUSSON,
taken pursuant to notice before Beth Gaige,
RPR, a Notary Public in and for the State of
Maine, at the offices of Bernstein Shur, 100
Middle Street, Portland, Maine, on
September 18, 2024, commencing at 8:31 A.M.

1 Q. Okay. So you were encouraged to keep those
2 things within that circle of trust that Mr.
3 Baugh had created?

4 A. Correct.

5 Q. You then state: A former analyst asked to
6 speak with HR about our work conditions and
7 was immediately let go.

8 Do you remember that happening?

9 A. Yes.

10 Q. Who was that former analyst?

11 A. Madeline.

12 Q. Do you remember the circumstances?

13 A. Yes.

14 Q. What were they?

15 A. We were giving a presentation, and I think
16 Stephanie Popp thought that Madeline had some
17 kind of attitude. And Madeline -- and so
18 Stephanie said something to Madeline, and
19 Madeline, in her response, said something
20 about how she was unhappy at work and
21 stressed. And so I think Stephanie told her
22 to go home. And I don't know if it was, like,
23 take a leave or something like that.

24 And then at that point Madeline reached
25 out to Concentric, and then she was let go by

1 Concentric at, what I'm guessing, is Stephanie
2 and Jim's request.

3 Q. Okay. Was the Concentric contract terminated
4 after that?

5 A. I believe shortly thereafter.

6 Q. Okay.

7 A. I'm not sure about the timing.

8 Q. Okay. And you -- you went on to write in that
9 letter: Once staff within Concentric learned
10 about our work environment and asked to speak
11 with our leadership, Jim immediately
12 terminated Concentric's contract with eBay
13 during a screaming match the analysts
14 witnessed.

15 Do you remember that?

16 A. Yes.

17 Q. Okay. And so do you remember that in the
18 aftermath of Madeline asking for a contract --
19 a contact with HR, contacting Concentric on
20 her own and then Mr. Baugh learning about that
21 that Mr. Baugh not only fired Madeline but
22 also fired Concentric?

23 A. Yes.

24 Q. Okay. You then went on to write: I apologize
25 if this is disjointed, but I simultaneously

1 his sexual exploits?

2 A. No.

3 Q. Were you aware that Zea reported harassment
4 from a coworker of hers to Concentric?

5 A. No.

6 Q. Were you aware that -- in your letter you say
7 that communications with Concentric were
8 effectively blocked, and you testified earlier
9 to what you meant by that.

10 Do you recall that testimony?

11 A. Yes.

12 Q. So is it fair to say that Baugh, Jim Baugh,
13 did not want the analysts, including those
14 contracted through Concentric, to talk with
15 any personnel or HR at Concentric?

16 A. That is the sense that I got.

17 Q. And you know of one instance where that
18 happened and nameless was immediately fired,
19 according to your letter; is that correct?

20 A. Yes.

21 Q. So it -- it was well known to the analysts
22 that they, you know, better not contact
23 Concentric or anyone outside of the GIC on any
24 issue or it would be to their peril and that
25 Baugh or other eBay leadership in the GIC

1 would take retaliatory action?

2 A. That was the sense that I got and I think that
3 my coworkers shared.

4 Q. Earlier in the deposition you talked about
5 your eBay supervisors, including Baugh,
6 referring to the circle of trust.

7 Do you recall that testimony?

8 A. Yes.

9 Q. And was that in reference to the importance of
10 keeping things secret within the GIC?

11 A. I wouldn't say secret but having a loyalty to
12 our team.

13 Q. You also referenced in your letter that Baugh
14 was clear about how important it was that all
15 the analysts be loyal to him; is that correct?

16 A. Yes.

17 Q. Now, you wrote that letter as part of the --
18 the criminal action against Zea related to
19 when Zea was convicted of certain felonies
20 regarding her actions as to the Steiners,
21 correct?

22 A. Correct.

23 Q. And so at -- at some point you learned about
24 some of the conduct or activity that was taken
25 as to the Steiners, true?